

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Response Efforts Undertaken During)	PS Docket No. 17-344
2017 Hurricane Season)	

MOTION FOR EXTENSION OF TIME

The National Hispanic Media Coalition (“NHMC”) respectfully requests, pursuant to 47 C.F.R. § 1.46, an eight-week or longer extension of time to file reply comments responsive to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice released on December 7, 2017 seeking comment “on the resiliency of the communications infrastructure, the effectiveness of emergency communications, and government and industry responses to the 2017 hurricane season,”¹ in the above-captioned docket. NHMC recognizes that “[i]t is the policy of the Commission that extensions of time shall not be routinely granted.”² However, an extension is essential to ensure that all Americans still reeling and recovering from the devastating impact of the 2017 hurricane season have an opportunity to submit comments on the status of communications services in their communities. NHMC is particularly concerned about the ongoing humanitarian crisis and disruption to communications services caused by Hurricanes Irma and Maria still impacting Puerto Rico and the U.S. Virgin Islands. In order to “better understand how

¹ *Public Safety and Homeland Security Bureau Seeks Comment on Response Efforts Undertaken During 2017 Hurricane Season*, Public Notice, PS Docket No. 17-344, DA 17-1180 at 1 (Dec. 7, 2017) (*2017 Hurricane Docket*).

² 47 C.F.R. § 1.46(a).

well”³ communications access was provided during and after these hurricanes it would be prudent for the Commission to extend the reply comments deadline allowing all affected individuals an opportunity to comment and for a more complete docket.

Robust and resilient communications networks are vital to our nation’s well being and are especially critical to public safety and emergency services during and following natural disasters. Accordingly, the FCC plays a vital role and has been tasked with studying the “best methods of obtaining cooperation and coordination” in order to obtain “maximum effectiveness from the use of radio and wire communications in connection with safety of life and property.”⁴ Indeed, “promoting safety of life and property through the use of wire and radio communication,”⁵ is one of the main purposes of and for which the Commission was created. The Commission also has recognized that the 2017 hurricanes “devastated communities and the communications networks that service them.”⁶

The 2017 Atlantic hurricane season was “extraordinary by any standard, with a total of 17 named storms, including 10 hurricanes--six of which were classified as major storms, measuring Category 3-5 on the Saffir-Simpson Wind Scale.”⁷ It was “one of the most devastating Atlantic hurricane seasons of all times”⁸ and “a top-10 hurricane season by most metrics.”⁹ September was

³ *2017 Hurricane Docket* at 1.

⁴ *Id.* at 2, citing 47 C.F.R. § 154(o).

⁵ 47 C.F.R. § 151.

⁶ *2017 Hurricane Docket* at 1.

⁷ Philip J. Klotzbach, PhD, *2017 Atlantic Hurricane Season in Review: One for the Record Books*, (Nov. 30, 2017), <http://www.iii.org/insuranceindustryblog/?p=5628>.

⁸ *Id.*

⁹ Kevin Loria, *The 'extremely active' 2017 hurricane season is finally over — here are the insane records it set*, (Nov. 30, 2017), <http://www.businessinsider.com/atlantic-hurricane-season-records-2017-11>.

a particularly active month breaking “the Atlantic calendar month record for named storm days, hurricane days, major hurricane days and Accumulated Cyclone Energy (ACE).”¹⁰ And when Hurricane Maria made landfall on September 20, 2017, it was the strongest hurricane to strike Puerto Rico since 1928.¹¹

After Maria struck, the FCC reported that overall 95.2 percent of cell sites in Puerto Rico were out of service with 25 of the 43 counties reporting 100 percent of their cell sites out of service.¹² The FCC also reported that in the U.S. Virgin Islands overall 76.6 percent of cell sites were out of service.¹³ Over four months after the hurricane, 5.8 percent of cell sites still remain out of service in Puerto Rico, and 13.8 percent of cell sites remain out of service in the U.S. Virgin Islands.¹⁴ Additionally, nearly half a million people are still without power in Puerto Rico,¹⁵ and some reports indicate that areas will not have power until next spring.¹⁶ The Commission needs to hear from these individuals and communities as to their experiences as “communications service users.”¹⁷ Yet today many of these users literally remain in the dark and are unable to share their

¹⁰ Philip J. Klotzbach, PhD, *2017 Atlantic Hurricane Season in Review: One for the Record Books*, (Nov. 30, 2017), <http://www.iii.org/insuranceindustryblog/?p=5628>.

¹¹ *See id.*

¹² *See* Federal Communications Commission, Communications Status Report for Areas Impacted by Hurricane Maria (Sept. 21, 2017), https://apps.fcc.gov/edocs_public/attachmatch/DOC-346840A1.pdf.

¹³ *Id.*

¹⁴ *See* Federal Communications Commission, Communications Status Report for Areas Impacted by Hurricane Maria at 2 (Feb. 7, 2018), https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0207/DOC-349080A1.pdf.

¹⁵ Ray Sanchez, *Nearly half a million in Puerto Rico still in the dark 4 months after Hurricane Maria*, CNN (Jan. 25, 2018), <https://www.cnn.com/2018/01/25/us/puerto-rico-hurricane-maria-power/index.html>.

¹⁶ Frances Robles and Jess Bidgood, *Three Months After Maria, Roughly Half of Puerto Ricans Still Without Power*, New York Times (Dec. 29, 2017), <https://www.nytimes.com/2017/12/29/us/puerto-rico-power-outage.html>.

¹⁷ *2017 Hurricane Docket* at 3.

experiences in the docket. In order to adequately assess and study the impact that the 2017 hurricane season had on the ability to communicate during and post-hurricane strikes, the Commission would benefit from extending the deadline for reply comments.

Further, the Commission has not yet deactivated its Disaster Information Reporting System (“DIRS”) in Puerto Rico and, in its most recent report, noted that due to “widespread power outages in Puerto Rico and the U.S. Virgin Islands, the FCC has received reports that fairly large percentages of consumers are without either cable services or wireline service.”¹⁸ The Commission has also proposed significant changes to the Lifeline program;¹⁹ proposals that are intertwined with this inquiry and vice-versa. The Commission extended the deadlines for comments and reply comments in the Lifeline proceeding²⁰ tacitly acknowledging the inability of residents in Puerto Rico and U.S. Virgin Islands to participate in the proceeding.²¹ The Lifeline proceeding, this Public Notice, and the proposed subsequent workshops, will inform preparation and response efforts as the Atlantic hurricane season begins on June 1 this year.²² Granting this extension of time will better inform the Commission, companies, and the millions of individuals impacted by hurricanes on better preparation and response efforts.

¹⁸ See Federal Communications Commission, Communications Status Report for Areas Impacted by Hurricane Maria at 5 (Feb. 7, 2018), https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0207/DOC-349080A1.pdf.

¹⁹ See *Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket Nos. 17-287 et al., Notice of Proposed Rulemaking, FCC 17-155 (Dec. 1, 2017).

²⁰ See *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287, Order, DA 18-62 (Jan. 23, 2018) (partially granting NHMC’s Motion for Extension of Time).

²¹ See *Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket Nos. 17-287 et al., Motion for Extension of Time, National Hispanic Media Coalition (Jan. 17, 2018).

²² See National Hurricane Center, National Oceanic and Atmospheric Administration, <http://www.nhc.noaa.gov/>.

Additional time for reply comments would also allow the Commission and interested parties the opportunity to find alternative means to collect the requested information.²³ Affected residents and communities should be able to fully participate in this proceeding. They should also have adequate notice and opportunity to comment on their experiences, which would improve the Commission's ability to assist during future natural disasters and help mitigate the devastating impact on the communications infrastructure.

For the above stated reasons, NHMC respectfully requests that the Commission extend the reply comments deadline in the above-captioned proceeding by a minimum of eight weeks in order to provide Puerto Rico and other communities impacted by the devastating and extraordinary 2017 hurricane season the opportunity and necessary time to comment.

Respectfully Submitted,

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²³ See Tell Your Story: The FCC Needs to Know about the Impact of Hurricane Maria on Communications Services in Puerto Rico, http://act.freepress.net/letter/internet_fcc_pr/?source=fp-action-page (last visited Feb. 8, 2018).